



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 1, 2006

VIA FACSIMILE

Robert K. Kelner, Esq.
Covington & Burling LLP
1201 Pennsylvania Avenue NW
Washington, DC 20004-2401

Re: MUR 5849
Bank of America Corporation

Dear Mr. Kelner:

This is in response to your letter dated October 30, 2006, which we received on October 31, 2006, requesting an extension of 14 days to respond to the Commission's reason to believe findings and factual and legal analysis. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on November 24, 2006.

If you have any questions regarding this matter, please contact me at (202) 694-1650.

Sincerely,

Marianne Abely
Marianne Abely